

# **Exhibit KK**

**In The Matter Of:**

**ADELPHIA COMMUNICATIONS CORP. v.  
DELOITTE & TOUCHE, LLP**

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**JOSEPH MICHAEL BRADY**

*March 10, 2005*

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**LEGALINK MANHATTAN**

**420 Lexington Avenue - Suite 2108**

**New York, NY 10170**

**PH: 212-557-7400 / FAX: 212-692-9171**

**BRADY, JOSEPH MICHAEL**



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1 JOSEPH MICHAEL BRADY  
 2 frame and when I learned different things.  
 3 You know, I know what the legal exposure was,  
 4 but I don't know everything I knew then. I  
 5 think I knew that, you know, again, the  
 6 inter-creditor agreement, and I don't recall  
 7 the point in time when I learned over things.  
 8 Q. Were you aware of any information  
 9 that might have supported a claim that the  
 10 Rigases were doing things to manipulate the  
 11 company's EBITDA?  
 12 A. I -- I had knowledge of things  
 13 that were aggressive accounting. I didn't  
 14 know -- certainly didn't know that they were  
 15 manipulating EBITDA.  
 16 Q. What were the aggressive  
 17 accounting points that you just referred to?  
 18 A. I knew that the company was very  
 19 aggressive in its capitalization. I knew that  
 20 there were signif -- significant marketing  
 21 adjustments that were -- marketing credits  
 22 relative to set-top boxes that were being made  
 23 in the financials. I knew there were, if I  
 24 didn't say it, significant programing  
 25 adjustments. I think those were the major

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 2 items that, you know, I -- I was aware that  
 3 there were adjustments that were going through  
 4 the financials that were related to those  
 5 items.  
 6 Q. When you refer to marketing  
 7 credits relative to set-top boxes that were  
 8 being made in the financials, are you  
 9 referring to -- to the marketing support  
 10 payments from Scientific Atlanta and Motorola?  
 11 A. Yes.  
 12 Q. And what did you know about those?  
 13 A. Well, I knew that there -- there  
 14 was such a thing. And I also knew that, as a  
 15 result of doing the work on the budgets, there  
 16 were -- there were several items that were not  
 17 really apart of the operating budgets that  
 18 were a part of EBITDA, and those were  
 19 separated because the Operations people didn't  
 20 control them and we didn't report on them in  
 21 the monthly reviews. And that was one of the  
 22 major items that -- that showed up.  
 23 Q. Were you aware at the time of the  
 24 relationship between the marketing support  
 25 payments and purchase price adjustments that

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 2 had been agreed to around the same time?  
 3 MS. CALLAHAN: Objection.  
 4 THE WITNESS: I -- I'm not sure I  
 5 understand your question. I was -- I was  
 6 aware of the marketing support payments and  
 7 I was aware that they were made based upon  
 8 the, you know, cost of the set-top box and  
 9 how many were purchased.  
 10 BY MR. SHULMAN:  
 11 Q. Were you aware at the time that  
 12 the marketing support payments equalled  
 13 amounts by which the company had agreed to in  
 14 -- to -- strike that. Let -- let me try it  
 15 again.  
 16 Were you aware at the time that  
 17 the -- that the marketing support payments  
 18 equalled the price increases that the company  
 19 had agreed to at about that same period of  
 20 time?  
 21 MS. CALLAHAN: Objection.  
 22 THE WITNESS: I don't think I was  
 23 aware that they exactly equalled the price  
 24 increases.  
 25 BY MR. SHULMAN:

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 2 Q. Were you aware that they  
 3 approximately equalled them?  
 4 A. No.  
 5 Q. You -- you also mentioned  
 6 programing adjustments.  
 7 A. Yes.  
 8 Q. What -- what does that refer to?  
 9 A. I'm not familiar with the -- with  
 10 the nature of the items or why they were  
 11 recorded, but I know that there was some  
 12 significant reductions in programing expense,  
 13 again, down below the operating line that  
 14 occurred, and I -- I knew that -- that they  
 15 existed. I didn't know anything about why  
 16 they existed or what they were.  
 17 Q. And what about the programing --  
 18 the programing adjustments caused you concern?  
 19 MR. BRENNER: Object to form.  
 20 MS. CALLAHAN: Objection.  
 21 THE WITNESS: Well, they -- I -- I  
 22 don't believe concern is the right word.  
 23 They were very large.  
 24 BY MR. SHULMAN:  
 25 Q. Okay.

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Q. And did you raise that issue with anybody at the company?

A. No, other than I believe the same conversation -- I'll correct that. No, I think in the same conversation with Tim Werth we were just having a general conversation regarding those below the line items, and I -- I believe I would have asked him about those as well in terms of what would be booked going forward.

Q. And what did he say?

A. I -- I don't recall his answer other than, again, I was satisfied with his answer. His answer was something like it's aggressive accounting, Deloitte knows about the accounting, and that was pretty much it.

Q. Did you ever ask anybody at Deloitte whether -- what their awareness was of the accounting?

A. No.

Q. Did you ever raise any issue or any aspect of the marketing support payments with anybody from Deloitte?

A. No.

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Q. Was it your understanding that -- that the way the marketing support was accounted for -- actually, strike that.

When you used the phrase "below the line items" in one of your prior answers, tell me what you mean by that.

A. What I mean is that when I initially started doing the budgeting reviews which would be conducted with all of the Regional Vice-Presidents, we had a lot of confusion about accounting adjustments affecting numbers that they had no responsibility for. That would be an example. So all of those items in those reviews was moved down below the line, so that we would only be discussing the numbers that they were responsible for in Operations. So we never really got into any of those other items. And, in fact, like on the '02 budget, those would have been budgeted by the accounting people, we would not have known how to budget them.

Q. Again, you used the phrase "below the line." I'm not sure I understand what

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below the line means.

A. Okay.

Q. So I think you got to define what -- what -- what that means.

A. All right. Let me try it this way: When we would go into a budget meeting, we would be reviewing not the EBITDA number, we would review -- review only those numbers down to a line that the managers were responsible for. That would not include, for instance, the programing credit. So when I say below the line, the line stopped at -- at all of the items that the Operations people were responsible for. And so when I say below the line, it would be all of the accounting, adjustments, and other items that they did not have direct responsibility for.

Q. Does below the line mean below the EBITDA line or does it mean below some other line?

A. No, it means below the line that we looked at --

Q. Okay.

A. -- for operational analysis

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purposes.

Q. You said that you had lots of con -- at that -- when you started doing budgeting you had lots of confusion about accounting adjustments affecting numbers that the Operations people had no responsibility for. Explain what you mean by that.

A. Well, two good examples would be the ones that we've talked about, the marketing credit adjustments and the programing adjustments. When those adjustments would come through, if they effected a person in a particular region, they wouldn't know anything about them.

Q. And did you raise this concern about -- or this confusion about these accounting adjustments with any of the Rigases?

A. Yes.

Q. With whom?

A. I believe both Mike and Tim Rigas.

Q. Can you tell me what you said and what they said?

A. What I said was is we can't

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continue to have confusion in these meetings over items that they don't have responsibility for, and we need to delineate between those items that they understand and control and confine our discussion to those, and show the other items in an area where we're not going to focus on those in those Operational meetings.

Q. And what -- what did they say?

A. They -- they agreed. I don't know whether they initially agreed, but they -- it wasn't very long before that's what we did.

Q. Okay. Was it your understanding that the -- that the marketing support adjustments, if I can use that term, had the effect of increasing EBITDA?

A. Yes.

Q. And the programing adjustments, they have the effect of increasing EBITDA?

A. Yes. Assuming that the adjustments were -- reduce the expense.

Q. And that was your understanding, I take it?

A. Well, I didn't see all of the

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different adjustments, but my overall understanding was the ones I was looking at that -- that hit my radar screen were reducing the programing expense.

Q. Did you ever raise with any of the Deloitte people the -- the fact that you were seeing certain significant adjustments that caused questions in your mind that had the effect of increasing EBITDA?

A. No.

Q. Did you ever raise that with any non-Rigas member of the Board of Adelphia?

A. No.

Q. Did you ever raise it with any of the Rigases?

A. Well, as I mentioned before, I raised them, and I didn't raise -- I didn't use the word questions. I'm not sure that's what I said. I certainly -- they were creating a lot of confusion in the Operational reviews, and I had an awareness of them, and, yes, I did talk to the Rigases about them in order to get the Operational reviews so that we could talk about the numbers that the

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people control.

Q. Did you -- did you raise the issue with the Rigases in the context of these adjustments are being made and they're significant adjustments, and they are having a significant positive impact on EBITDA?

MS. CALLAHAN: Objection. Do you want to be more specific with respect to the Rigases?

MR. SHULMAN: Any of the Rigases. And then if he did, we'll get to them, to which one.

THE WITNESS: I don't believe I addressed them in the context that they were having a positive impact on EBITDA. I addressed them within the context that they were significantly impacting the numbers, and if we included those numbers in the Operational reviews, people wouldn't be able to -- to respond to our questions.

BY MR. SHULMAN:

Q. Okay. I take it that you didn't focus on the EBITDA impact, you focused on people not understanding what the numbers are?

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A. Right. My job was Operations and Operational reviews. I didn't focus on the accounting aspects of those and whether they were right or wrong. It was that they were creating confusion with the process I was responsible for.

Q. One of the other areas of aggressive accounting that you mentioned was capitalization; is that right?

A. Yes.

Q. And what was it about -- that you observed about the capitalization practices that -- that made you conclude that they were aggressive?

A. Could you clarify the time frame we're asking about?

Q. Up to the point that the Rigases left. So any time in -- in there.

A. Yes. Well, I knew that the -- the company had historically been aggressive with respect to capitalizing costs.

Q. And aggressive means what?

A. Aggressive means that the upper -- well, aggressive means at the upper end or

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1 JOSEPH MICHAEL BRADY  
 2 A. Yes, I did.  
 3 Q. The memo indicates in the next  
 4 part of it, the top of the next page and down  
 5 to the heading that there were four contacts  
 6 that you had had with the Rigas and then  
 7 it descr -- the Rigases and then it describes  
 8 those contacts.  
 9 Do you see that?  
 10 A. Yes.  
 11 Q. Can you take a -- a brief moment  
 12 or more if you need it to just look at the  
 13 four contacts that are described there and  
 14 tell me whether that is an accurate summary of  
 15 the contacts that you had had with the Rigases  
 16 up to that point.  
 17 A. Okay. Well, in the first bullet,  
 18 I mean, I agree, although, I don't know, some  
 19 of these adjectives I can't imagine that I  
 20 said, like shell-shocked, but regardless that  
 21 meeting took place.  
 22 Second one took place. I don't  
 23 recall the -- the handcuffs.  
 24 John Rigas... Yeah, I kind of  
 25 remember that with Ron, I asked his opinion on

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1 JOSEPH MICHAEL BRADY  
 2 that. I don't think I ever talked to John  
 3 though in that context on the third bullet.  
 4 Q. Okay.  
 5 A. I think the last comment, the way  
 6 they've characterized it, it's probably not  
 7 accurate. Actually, that's why I had the call  
 8 with them --  
 9 Q. Okay.  
 10 A. -- is because on November 6th I --  
 11 I saw the Rigases having dinner at a place in  
 12 Coudersport, and I hadn't seen them in a long  
 13 time, and I stopped and I went into their  
 14 property and, yeah, we talked a lot about very  
 15 personal things, just like what I described,  
 16 which most people outside of Coudersport can't  
 17 understand.  
 18 And so that's really, you know, my  
 19 view. And earlier why I said I was angry,  
 20 I -- I was -- I was angry that I would have a  
 21 conversation like that, follow the company  
 22 policy, and the next day be talking to four  
 23 attorneys.  
 24 Q. Was -- was it your impression that  
 25 the lawyers called you the next day because

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1 JOSEPH MICHAEL BRADY  
 2 you had had that conversation with the  
 3 Rigases?  
 4 A. Yes.  
 5 Q. Did you have an understanding as  
 6 to how the lawyers learned of that  
 7 conversation with the Rigases?  
 8 A. Yes, because I told -- told Randy  
 9 Fisher --  
 10 Q. Who was the general counsel?  
 11 A. -- as I was required to do, and  
 12 I'm sure he informed them and then I received  
 13 a call.  
 14 Q. And Randy Fisher was the general  
 15 counsel of Adelphia at the time?  
 16 A. Yes.  
 17 Q. Since the time of this interview,  
 18 have you had any contacts with any of the  
 19 Rigases?  
 20 A. Let me think about that. I have.  
 21 Let me just try to think of -- yeah, I can  
 22 recall two, two, two times.  
 23 One -- actually, three times. One  
 24 I was in a local restaurant and they all  
 25 walked in and I said hello. That was a

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1 JOSEPH MICHAEL BRADY  
 2 five-minute hello. I don't know the time  
 3 frame of that.  
 4 Q. Okay.  
 5 A. The other one was -- I do remember  
 6 the time frame 'cause it was right after I had  
 7 left my job at Adelphia. And I received a  
 8 call from Mike Rigas, and he asked me to come  
 9 out and meet with him, which I did.  
 10 Q. Meet with him about what?  
 11 A. Well, hadn't seen them in a long  
 12 time, it was a social visit, but also I think,  
 13 you know, it was a visit to understand why I  
 14 left Adelphia and what I was going to be  
 15 doing, you know, and whether I was going to  
 16 stay there and keep my kid in school, and that  
 17 sort of thing.  
 18 Q. Was there any discussion about  
 19 the -- the criminal proceedings?  
 20 A. No.  
 21 Q. Were you ever asked by either the  
 22 government or any of the Rigases about being a  
 23 witness at the criminal trial?  
 24 A. The only thing one of -- I don't  
 25 know -- one -- an attorney did contact me on



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 2 two or three occasions to speak with them  
 3 regarding -- regarding what, I don't know.  
 4 Q. Do you know --  
 5 A. And I -- I refused to do that.  
 6 Q. Do you know who that lawyer was or  
 7 who he represented?  
 8 A. I'm not sure. It might have been  
 9 Christie, but I -- I don't know. I know they  
 10 represented the Rigases and I know they -- I  
 11 called them -- I returned their call several  
 12 times.  
 13 Q. But never talked to them?  
 14 A. No, I told them I wasn't willing  
 15 to talk to them.  
 16 Q. How many times -- how many times  
 17 were you asked to talk to Rigas lawyers with  
 18 regard to the criminal trial?  
 19 A. I think it was three times.  
 20 Q. Did any lawyers for Adelphia ever  
 21 ask you if they could talk to you about any of  
 22 the other proceedings that are going on  
 23 regarding Adelphia?  
 24 A. I don't believe so.  
 25 Q. Anybody from the Boies Schiller

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1 JOSEPH MICHAEL BRADY  
 2 firm ever contact you?  
 3 A. No.  
 4 Q. Anybody from the Dechert firm ever  
 5 contact you?  
 6 A. Again, these firms, if -- if they  
 7 don't represent the Rigases, they didn't.  
 8 Q. Okay.  
 9 A. But I don't know who they are.  
 10 Q. Okay.  
 11 A. I mean, I know who they are, but I  
 12 don't know who they represent.  
 13 Q. The -- the -- the incident --  
 14 the -- the incident with Michael Rigas and  
 15 going to his house to talk to him, about how  
 16 long did you spend?  
 17 A. Probably spent an hour, and I  
 18 spoke with Mike, Tim and to a very limited  
 19 extent John.  
 20 Q. Do you recall anything of  
 21 substance that was said?  
 22 A. The only thing John asked me some  
 23 questions about, well, you know, how did you  
 24 get fired and all this stuff, and how did they  
 25 tell you you were going to leave. And it was

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1 JOSEPH MICHAEL BRADY  
 2 very abbreviated. I didn't want to talk about  
 3 it. And I just said it really didn't happen  
 4 that way, John, it was really more than  
 5 anything my decision.  
 6 Q. And did he say anything at that  
 7 point?  
 8 A. No.  
 9 Q. And did you have any discussion of  
 10 substance with Tim Rigas?  
 11 A. No, we just talked purely about  
 12 golf and my children.  
 13 Q. During this time at Mike Rigas's  
 14 house --  
 15 A. This was actually at their -- just  
 16 to clarify, they have a building that's kind  
 17 of a business. It's not Mike's house.  
 18 Q. Okay.  
 19 A. It's separate from their house,  
 20 that's why --  
 21 Q. On their property?  
 22 A. On their property. And that's  
 23 where they were.  
 24 Q. Was there any discussion of what  
 25 had happened at Adelphia?

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1 JOSEPH MICHAEL BRADY  
 2 A. I don't -- I don't think so. It  
 3 was -- it was a type of meeting where it was  
 4 purely personal. And as I said, John  
 5 interjected a couple things that were getting  
 6 close to business related, I think Tim and  
 7 Mike understood that that's not what we wanted  
 8 to talk about, and we talked about personal  
 9 matters.  
 10 Q. I think you indicated that there  
 11 was a third time that you had contact with the  
 12 Rigases.  
 13 A. Right. The third time was right  
 14 after the trial. I was actually lost and I  
 15 was walking down Colesburg Road and I'd  
 16 already walked about nine miles and Mike Rigas  
 17 was getting out of his car, and -- just by  
 18 chance, and I walked across the street and  
 19 said hello to him.  
 20 Q. Anything of substance then?  
 21 A. No.  
 22 Q. Any mention made of the results of  
 23 the criminal trial?  
 24 A. Yes, he just mentioned that, you  
 25 know, the -- Tim and John just needed to keep

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1 JOSEPH MICHAEL BRADY  
2 was with the accounting group. He worked  
3 for me in the budget group after I had  
4 hired Jim Devlin, and I have a lot of  
5 respect for Luke's ability and his  
6 integrity.

7 BY MR. SHULMAN:

8 Q. Did you form any view about the  
9 ability or integrity of Doug Malone?

10 MS. CALLAHAN: Objection.

11 THE WITNESS: I worked with Doug  
12 in a limited amount. I -- I felt -- I felt  
13 like he was pretty -- pretty good and I  
14 never had any question about his integrity.

15 BY MR. SHULMAN:

16 Q. During the time that you worked at  
17 Adelphia, up to the point where the Rigases  
18 disengaged or were terminated, did you ever --  
19 was there ever a question in your mind about  
20 whether the company was manipulating its  
21 publicly reported financial results?

22 MS. CALLAHAN: Objection.

23 THE WITNESS: I wouldn't state it  
24 in those terms. Again, I stated earlier  
25 that I noticed that there were differences,

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1 JOSEPH MICHAEL BRADY  
2 but I never thought that it was  
3 manipulation. I wouldn't have the  
4 information to know that.

5 BY MR. SHULMAN:

6 Q. Did -- when you saw that there  
7 were differences, between the internal numbers  
8 and the external numbers, did you attempt to  
9 talk to more senior executives like Tim Rigas  
10 or Michael Rigas to try to resolve in your own  
11 mind the inconsistencies?

12 A. I think you asked me that before  
13 and I had indicated that I did talk to Mike  
14 Rigas at one time and no one else.

15 Q. And after that discussion with  
16 Michael Rigas, did he resolve for you the  
17 inconsistencies?

18 A. No.

19 Q. During the time that you worked at  
20 Adelphia, up -- again up to the point where  
21 the Rigases were terminated, did you ever have  
22 a question raised in your own mind about  
23 whether the company was failing to disclose  
24 material information in its public financials?

25 A. No.

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2 Q. During this same time, did you  
3 ever have a question in your own mind as to  
4 whether the company was maintaining two sets  
5 of books, one for internal purposes and one  
6 for external purposes?

7 A. No, I -- I didn't, other than what  
8 I mentioned earlier, which is the only thing I  
9 can -- based on my knowledge is the only thing  
10 I can relate to the testimony that was  
11 provided on two sets of books was we did have  
12 two different views of looking at things. One  
13 was the operational and one was...

14 Q. During the time that you were --  
15 during the same period of time, okay, did you  
16 ever have a question as to whether the senior  
17 financial executives of the company were doing  
18 things that were -- that were meant to  
19 overstate or manipulate EBITDA?

20 A. No.

21 Q. Did you ever have a question in  
22 your mind as to whether the senior financial  
23 executives were doing things to manipulate  
24 debt covenant compliance?

25 A. No.

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1 JOSEPH MICHAEL BRADY

2 Q. Did you ever form a view -- strike  
3 that.

4 Did you ever have a question in  
5 your own mind as to whether the senior  
6 executives were or might be doing things to  
7 inflate the management fees charged to the  
8 Rigas entities that the company managed?

9 A. No.

10 Q. Did you ever have a question in  
11 your mind as to whether the financial  
12 executives of the company might be improperly  
13 transferring debt from Adelphia books to Rigas  
14 entity books?

15 A. No.

16 Q. Did you ever have a question in  
17 your mind as to whether senior executives were  
18 manipulating statistics that were publicly  
19 reported regarding the rebuild efforts of the  
20 company?

21 A. No.

22 Q. In -- going back to Exhibit 184,  
23 the email, and I think maybe we've covered  
24 this already, but if you look down in the  
25 second paragraph of the email there's -- there



# **Exhibit LL**

**In The Matter Of:**

**ADELPHIA COMMUNICATIONS CORP. v.  
DELOITTE & TOUCHE LLP**

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**ANN MONTGOMERY**  
*May 19, 2005*

---

**LEGALINK MANHATTAN**  
**420 Lexington Avenue - Suite 2108**  
**New York, NY 10170**  
**PH: 212-557-7400 / FAX: 212-692-9171**

**MONTGOMERY, ANN**



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ANN MONTGOMERY

Q. And the pie charts were in connection with what?

A. Investor presentations.

Q. And are they presentations that you made?

A. I participated in some of the presentations. Mainly the customer service side.

Q. Do you happen to know how Adelphia defined when a mile of plant was rebuilt?

A. No, I don't recall.

Q. Do you recall there being any difficulties with people in the field delaying and reporting miles rebuilt for the plant?

A. I don't recall any delays.

Q. Do you recall receiving a memo from Rob McVie that described problems with late reporting of completed miles?

A. I don't recall that, no.

Q. Did Tim Rigas ever tell you to change the 2002 rebuild numbers for any presentation because he thought they were too aggressive?

A. Tim Rigas, no, he did not. That I recall. I don't recall that.

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ANN MONTGOMERY

Q. I don't think you told us what your salary was when you were at Adelphia. Could you tell me what your salary was.

A. When I started there it was \$325,000 a year, and I received a merit increase while I was there. When I left my rate was \$340,000 a year.

Q. Do you know of any Adelphia personnel that were paid higher than you?

A. I don't know what anybody else's pay was, no.

Q. Do you know what any of the Rigases were paid?

A. Oh, just from their -- on the profile on Yahoo, I think it was 209,000 a year, I'm not sure. So no, I don't know their actual compensation.

Q. Prior to March 27th, 2002 were you aware of any improper conduct by any of the Rigases?

A. You'd have to define "improper conduct."

Q. With respect to the issues that have arisen to the paper and in the criminal trial --

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ANN MONTGOMERY

A. No, I was not aware.

Q. Thank you, I think that's all I have.

MR. BRENNER: I've got nothing.

MR. DAVIS: I just have a couple, I'm sorry.

EXAMINATION CONTINUED BY MR. DAVIS:

Q. In answer to Ms. Vendzules questions, you mentioned a couple of people with whom you have retained friendships, who you talked to after the criminal trial respecting their testimony regarding numbers. Is that --

A. When you say "respecting their testimony regarding numbers," what do you mean?

Q. I mean the fact that during the criminal trial Karen Chrosniak, for example, admitted that she falsified certain numbers. Did you discuss that with her --

A. No. When we talk, we don't talk about the Adelphia case.

Q. How about Chris Turner, is that also true?

A. Chris Thurner. Correct.

Q. There was no discussion thereafter

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ANN MONTGOMERY

about their conduct at Adelphia and why they may have done the things they testified to?

A. No. It's purely friendship. Nothing about the company.

Q. Did you ever ask either of them, putting aside the specifics of what they may have done or not done, what motivated them to engage in conduct which got them into the situation that they had to testify about in the criminal trial?

A. No. I never asked them what their motivation was.

Q. Thank you.

(Continued on following page.)

43 (Pages 169 to 172)